

### **REMARKS**

Applicants continue to view the cited art in a different light than the Office and believe that when interpreted correctly, the cited art does not provide a proper basis for the rejections made by the Examiner.

### **Claim Rejections under 35 U.S.C. §103**

Claims 1, 3, 4 and 11 are rejected under 35 U.S.C. 103(a) as being unpatentable over Christie, et al. (US 6,002,689).

Applicants respectfully submit claims 1 and 11 conform to the provisions of 35 U.S.C. 103(a).

*The factual inquiries set forth in Graham v. John Deere Co., 383 U.S. 1, 148 USPQ 459 (1966), that are applied for establishing a background for determining obviousness under 35 U.S.C. 103(a) are summarized as follows:*

- 1. Determining the scope and content of the prior art.*
- 2. Ascertaining the differences between the prior art and the claims at issue.*
- 3. Resolving the level of ordinary skill in the pertinent art.*
- 4. Considering objective evidence present in the application indicating obviousness or non-obviousness.*

#### **As for claim 1:**

Claim 1 requires, among other things, “networks which have various different address planning and different network structures.”

“Networks which have various different address planning and different network structures” in claim 1 is not analogous to “networks having different formats” as in Christie. The “networks having various different address planning and different network structure” in claim 1 may be networks having the same format, for example an IP format. However, the subject matter of claim 1 is aimed at solving the interworking between networks having various different address planning and different network structure, in contrast to interworking between networks having different format. Networks having different formats in Christie only relate to networks of different network format (such as ATM, TDM and ISDN), rather than networks having various different address planning and different network structure. Therefore, Christie does not disclose

all the limitations of claim 1, and amended claim 1 is in conformity with the provisions of 35 U.S.C. 102(b).

Additionally, claim 1 requires “creating a media port that corresponds to the caller party equipment and a media port that corresponds to the called party equipment and establishing a mapping between the two media ports within the media interworking equipment.”

The Examiner asserts that this limitation is disclosed in Christie (col. 2 and col. 11, line 66 – col. 12, line 67). However, the portion of Christie cited by the Examiner does not disclose “creating a media port” and certainly does not disclose “creating a media port that corresponds to the caller party equipment and a media port that corresponds to the called party equipment” and “establishing a mapping between the two media ports within the media interworking equipment.” Additionally, Applicants do not see any other portions of Christie that disclose this subject matter.

For at least the foregoing reasons, Applicants respectfully submit that the scope and content of the prior art have not been properly determined, and the differences between the prior art and claim 1 of present invention have not been properly ascertained. Accordingly, no reason has been clearly articulated as to why the prior art would have rendered claim 1 obvious to one of ordinary skill in the art. Therefore, a prima facie case of obviousness has not been established with respect to claim 1. Simply put, since Christie does not disclose all the technical features of claim 1, claim 1 is in conformity with the provisions of 35 U.S.C. 103(a).

**As for independent claim 11 and dependent claims 3 and 4**, although different in scope from claim 1, claim 11 is allowable for at least the same reasons as claim 1. In addition, dependent claims 3 and 4 are allowable at least due to their dependence from independent claim 1. Accordingly, Applicants respectfully request that the Examiner reconsider and withdraw the rejection of claims 1, 3, 4, and 11 under 35U.S.C. § 103(a).

In an alternative rejection, claims 1, 5-10, 11, and 12-14 were rejected under U.S.C. 103(a) as being unpatentable over Modarressi, et al. (“Control and Management in Next-Generation Networks: Challenges and Opportunities”, IEEE Communications Magazine, October 2000; hereinafter Modarressi) in view of Sibille, et al. (US Pub. 2004/0190531).

For the reasons noted below, claims 1 and 11 conform to the provisions of 35 U.S.C. 103(a).

**As for claim 1:**

Claim 1 defines a method of “interworking ... between two broadband heterogeneous networks which have various different address planning and different network structures.”

Modarressi discloses a method of interworking teleservice between two broadband heterogeneous networks (IP and ATM networks) and “IP and ATM networks have different formats.” However, interworking between networks having different formats as disclosed by Modarressi is not the same as the network having various different address planning and different network structure as required in claim 1, which may be networks having the same format. Therefore, Modarressi does not disclose “interworking ... between two broadband heterogeneous networks which have various different address planning and different network structures.”

Claim 1 also requires “establishing a mapping between the two media ports within the media interworking equipment.” As admitted by the office, Modarressi does not disclose this technical feature. However, the Examiner asserts that Sibille discloses, “a method for signaling a bearer connection of another protocol coupled to a telecommunications network. [And that the] telecommunications network employs a first protocol, which in the exemplary embodiment is VoIP. The bearer connection employs a second protocol, such as VoATM.” The Examiner also asserts that, “setting up two-way ATM-TDM interworking bearer path; translating SDP port into ATM port; mapping IP port in SDP media data to EECID ATM port; transmitting to bearer connection; Vertical Interface Translation Function in media gateway performing mapping and translating” is disclosed by Sibille. (Fig.2, fig.3-5, paragraphs 33, 34, 42-48, 55-57, 60-62, and 67)

Applicants’ analysis of Sibille indicates that the port mapping in Sibille is used for translating between the first signal of the first protocol and the second signal of the second protocol, and inserting the first signal into the second signal by the gateway, for the purpose of transferring signals from one signaling protocol to another signaling protocol. However, the establishment of mapping two media ports in the media interworking equipment of claim 1 is used for establishing a connection between two media ports to transmit media streaming. The two features play obviously different functions in their respective technical schemes. Therefore, Sibille does not disclose, “establishing a mapping between the two media ports within the media interworking equipment” as required in claim 1. Since neither Modarressi nor Sibille

disclose this technical feature of claim 1, the combination of Modarressi and Sibille does not meet the requirements of Section 103.

For at least the foregoing reasons, Applicants respectfully submit that the scope and content of the prior art have not been properly determined, and the differences between the prior art and claim 1 have not been properly ascertained. Accordingly, no reason has been clearly articulated as to why the prior art would have rendered claim 1 obvious to one of ordinary skill in the art. Therefore, a prima facie case of obviousness has not been established with respect to claim 1.

**As for independent claim 11 and dependent claims 5-10 and 12-14**, although different in scope from claim 1, claim 11 is allowable for at least the same reasons as claim 1. In addition, dependent claims 5-10 and 12-14 are allowable at least due to their dependence from allowable independent claims 1 and 11. Accordingly, Applicants respectfully request that the Examiner withdraw the rejection of claims 1 and 5-14 under 35 U.S.C. § 103(a).

### **Conclusion**

In light of the above, the Applicants submit that the application is in condition for allowance and respectfully request that a Notice of Allowance be issued in this case. The Applicants also request that the Office telephone the attorneys of record in the event a telephone discussion would be helpful in advancing the prosecution of the present application.

Respectfully submitted,

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